REMARKS/ARGUMENTS

This Amendment is in response to the Office Action dated October 5, 2006. Claims 1, 2 and 4-12 are pending in the present application. Claims 1, 2 and 4-12 have been rejected. Claims 5 and 8 have been amended to address a §101 rejection. Applicants respectfully submit that no new matter has been presented. For the reasons set forth more fully below, Applicants respectfully submit that the claims as presented are allowable. Consequently, reconsideration, allowance, and passage to issue are respectfully requested.

Drawings

The Examiner has stated:

> **The drawings are objected to as failing to comply with 37 CFR 1.84(p)(5) because they do not include the following reference sign(s) mentioned in the description: 401, 403, 407 and 409 (see page 24, lines 22-28, of the specification)...**

In response, Figure 4 has been amended such that the reference numbers "411," "421," "423," "425," and "427" have been replaced with the reference numbers "401," "403," "405," "407," and "409," respectively. The corrected drawing is attached hereto.

Claim Rejections - 35 U.S.C. §101

The Examiner has stated:

> **Claims 5-10 are rejected under 35 U.S.C. 101 because the claimed invention is directed to non-statutory subject matter. Claims 5-10 appear to recite systems that can be implemented in software alone. The language of the claims raises the question of whether the claims include hardware required for the software to realize its functionality. Therefore, the claims are software, per se, and are rejected as being directed towards non-statutory subject matter.**

In response, claims 5 and 8 have been amended to clarify that the systems are computer-implemented. Applicants respectfully submit that claims 5 and 8, as amended, now complies with 35 U.S.C. §101. Dependent claims 6-7 and 9-10 depend from claims 5 and 8, respectively. Accordingly, Applicants respectfully submit that claims 5-10 overcome the rejection.

Claim Rejections - 35 U.S.C. §103

The Examiner has stated:

> Claims 1-2 and 4-12 are rejected under 35 U.S.C. 103(a) as being unpatentable over Ben-Shachar (US 5,761,656), in view of Flanagan et al. (US 6,243,737 B1).
> As to claim 1, Ben-Shachar substantially discloses a method of processing an application request on an end user application and an application server (abstract; col. 5 lines 2-16) comprising:
>
> a) initiating the application request on the end user application in a first language with a first application program (col. 5 lines 6-10);
>
> b) transmitting the application request to the server and converting the application request from the first language of the first end user application to a form for the language running on the application server (col. 5 lines 3-12), wherein the end user application is connected to the application server through a connector (col. 5 lines 2-16, execution manager 150);
>
> c) processing said application request on the application server (col. 5 lines 6-15);
>
> d) transmitting a response to the application request from the application server to the end user application, and converting the response to the application request from the language running on the application server to the first language of the first end user application (col. 5 lines 12-17); and
>
> e) wherein the connector is configured to (i) convert the application request from the first language of the first end user application as a source language to the language running on the application server as a target language (col. 5 lines 6-12), and (ii) convert a response to the application request from the language running on the application server as a source language to the first language of the first end user application as a target language (col. 5 lines 13-16), each comprise:
>
> 1) invoking connector metamodels of respective source language and target language ("mapping file" col. 5 lines 6-15);
>
> 2) populating the connector metamodels with metamodel data of each of the respective source language and target language, the metamodel data of the target language including a map, mapset, and a mapfield (Figures 3 and 10; col. 5 lines 29-48; col. 9 lines 10-22); and

3) converting the source language to the target language (col. 9 lines 10-22).

Ben-Shachar fails to specifically disclose a mapping support language and a web server. However, Flanagan et al. disclose a mapping support language (col. 10 lines 1-16). It would have been obvious to one of ordinary skill in the art at the time of Applicant's invention to combine these references because both references focus on providing server processing to clients...

Response to Arguments

Applicant's arguments filed 17 July 2006 have been fully considered but they are not persuasive.

Applicant argues that Ben-Shachar does not teach converting the request from the first language to a form for the mapping support language on the server. However, Ben-Shachar teaches translating "the application requests into formats of the database" (col. 5 lines 9-10). The requests are translated so that the database can understand them. Since the database receives requests and sends responses, it functions as a server (col. 5 lines 9-10, 13-14). Examiner has not relied upon Ben-Shachar to teach a mapping support language.

Applicant argues that Flanagan does not teach or suggest a mapping support language and combining Flanagan with Ben-Shachar would not produce the claimed invention. Examiner respectfully disagrees. Flanagan provides Basic Mapping Support map as an example of a host transaction map (col. 10 line 11). This can be imported from the host (Fig. 7 step 126). Therefore, Flanagan teaches importing a BMS map file from a host in order to create a host transaction (Fig. 7 step 126). The transaction map is used to create the host transaction, which is sent to the host (col. 2 lines 21-24). This at least implies that the host can be using a mapping support language. The transaction map is used to translate the transaction, which corresponds to translating application requests sent to a database taught by Ben-Shachar (col. 5 lines 7-12).

Applicant also argues that the combination of Ben-Shachar and Flanagan fail to specifically teach a map, a map set and a map field. However, Ben-Shachar teaches a map (Fig. 10 shows MAPPING RECORD 1030.1 being mapped to SELF-DESCRIBING RECORD 1020), a map set (Fig. 10 shows MAPPING PACKAGE 1010 which provides a set of maps, specifically 1030.1 mapped to 1020 and 1030.2 mapped to 1020) and a map field (Fig. 10 shows fields, including MAPPING FIELD 1040.1). A description of Fig. 10 is given in col. 9 lines 9-22.

Applicants respectfully disagree with the Examiner's rejections. The present invention provides a method of processing an application request on an end user application and an application server including a mapping support language. In accordance with the present invention, the method includes: a) initiating the application request on the end user application in a first language with a first application program; b) transmitting the application request to the server and converting the application request from the first language of the first end user application to a form for the mapping support language running on the application server,

wherein the end user application is connected to the application server through a web server, and the web server comprises a connector; c) processing said application request on the application server; and d) transmitting a response to the application request from the application server to the end user application, and converting the response to the application request from the mapping support language running on the application server to the first language of the first end user application. The connector is configured to (i) convert the application request from the first language of the first end user application as a source language to the language running on the application server as a target language, and (ii) convert a response to the application request from the language running on the application server as a source language to the first language of the first end user application as a target language. Each includes the steps of: 1) invoking connector metamodels of respective source language and target mapping support language; 2) populating the connector metamodels with metamodel data of each of the respective source language and target mapping support language, the metamodel data of the target mapping support language including a map, a mapset, and a mapfield; and 3) converting the source language to the mapping support language. Ben-Shachar in view of Flanagan does not teach or suggest these features, as discussed below.

Ben-Shachar in view of Flanagan does not teach or suggest "converting the application request from the first language of the first end user application to a form for the mapping support language running on the application server," as recited in independent claims 1, 5, and 8. Applicants agree with the Examiner that Ben-Shachar fails to specifically disclose a mapping support language. The Examiner has relied on Flanagan to cure the defects of Ben-Shachar. The Examiner has referred to column 10, line 11, and Figure 7, step 126, of Flanagan as disclosing

basic mapping support language as an example of a host transaction map, which can be imported from the host. However, nowhere does this section of Flanagan specifically teach or suggest a mapping support language. Instead, Flanagan describes a "host transaction map." The transaction map of Flanagan is clearly different from the mapping support language of the present invention, because Flanagan defines the transaction map merely as a "file that defines the input and output display data for a particular host transaction" (column 10, lines 5-7). In contrast to a mere transaction map, a mapping support language is a language that is run on the application server to process a request after the request is converted to a proper form. The transaction map of Flanagan cannot process a request, because the transaction map is merely a file that defines an input and output display.

The Examiner has referred to column 2, lines 21-24, of Flanagan, stating that the transaction map is used to create the host transaction. The Examiner has suggested that this section implies that the host can use a mapping support language, and that the transaction map is used to translate the transaction, which corresponds to translating application requests being sent to a database taught by Ben-Shachar (column 5, lines 7-12, of Ben-Shachar). However, column 2, lines 21-24, of Flanagan does not specifically mention the transaction map and only generally describes that "host transactions for a particular client transaction are submitted to a host system for processing concurrently with other host transactions for other client transactions." Nowhere does this section specifically describe how the transaction map functions, and this section clearly does not describe the transaction map as being the same as the mapping support language of the present invention.

Combining Flanagan with Ben-Shachar would not provide the present invention, but would instead provide a method for translating an application request into the format of a host transaction map. However, it would not make sense in the present invention for a request to be converted into a file that defines input and output display data. Accordingly, there is no motivation to combine Ben-Shachar and Flanagan to provide the present invention.

Since neither Ben-Shachar nor Flanagan teach or suggest the mapping support language of the present invention, Ben-Shachar in view of Flanagan does not teach or suggest the *combination of* "converting the response to the application request from the mapping support language running on the application server to the first language of the first end user application," and "populating the connector metamodels with metamodel data of each of the respective source language and target mapping support language, the metamodel data of the target mapping support language including a map, a mapset, and a mapfield," as recited in independent claims 1, 5, and 8. The Examiner has referred to the mapping record 1030.1, mapping package 1010, and mapping field 1040.1 of Figure 10 of Ben-Shachar as teaching the map, a mapset, and a mapfield of the present invention. However, column 9, lines 10-22, of Ben-Shachar describes a mapping record and mapping field in the context of "mapping from an HTML viewer 120 to database 130" (see column 9, lines 6-9), which is clearly different from the context of "populating the connector metamodels with metamodel data of each of the respective source language and target mapping support language," as in the present invention. Combining the mapping elements of Ben-Shachar with the "host transaction map" of Flanagan clearly fails to teach or suggest combination of the converting and populating steps of the present invention.

Therefore, Ben-Shachar in view of Flanagan does not teach or suggest the cooperation of elements as recited in independent claims 1, 5, and 8, and these claims are allowable over Ben-Shachar in view of Flanagan.

Independent claim 11

Similar to independent claims 1, 5, and 8, independent claim 11 recites "mapping support language metamodel data including a map, a mapset, and a mapfield." As described above, with respect to independent claims 1, 5, and 8, Ben-Shachar in view of Flanagan does not teach or suggest these elements. Accordingly, the above-articulated arguments related to independent claims 1, 5, and 8 apply with equal force to claim 11. Therefore, claim 11 is allowable over Ben-Shachar in view of Flanagan for at least the same reasons as claims 1, 5, and 8.

Dependent claims

Dependent claims 2, 4, 6-7, 9-10, and 12 depend from independent claims 1, 5, 8, and 11, respectively. Accordingly, the above-articulated arguments related to independent claims 1, 5, 8, and 11 apply with equal force to claims 2, 4, 6-7, 9-10, and 12, which are thus allowable over the cited references for at least the same reasons as claims 1, 5, 8, and 11.

Conclusion

In view of the foregoing, Applicants submit that claims 1, 2, and 4-12 are patentable over the cited references. Applicants, therefore, respectfully request reconsideration and allowance of the claims as now presented.

Applicants' attorney believes that this application is in condition for allowance. Should any unresolved issues remain, the Examiner is invited to call Applicants' attorney at the telephone number indicated below.

Respectfully submitted,

SAWYER LAW GROUP LLP

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/Joseph A. Sawyer, Jr./
Joseph A. Sawyer, Jr.
Attorney for Applicant(s)
Reg. No. 30,801
(650) 493-4540